

1 DAVID T. BIDERMAN, Bar No. 101577
2 JUDITH B. GITTERMAN, Bar No. 115661
3 M. CHRISTOPHER JHANG, Bar No. 211463
4 **PERKINS COIE LLP**
5 Four Embarcadero Center, Suite 2400
6 San Francisco, CA 94111-4131
7 Telephone: (415) 344-7000
8 Facsimile: (415) 344-7050
9 Email: DBiderman@perkinscoie.com
10 Email: JGitterman@perkinscoie.com
11 Email: CJhang@perkinscoie.com

12 Attorneys for Defendant Google Inc.

13

14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

16

17 CLRB HANSON INDUSTRIES, LLC d/b/a
18 INDUSTRIAL PRINTING, and HOWARD
19 STERN, on behalf of themselves and all others
20 similarly situated,

21 Plaintiffs,

22

23 v.

24

25 GOOGLE, INC.,

26 Defendant.

27

28

CASE NO. C 05-03649 JW

29 **[PROPOSED] ORDER GRANTING
30 GOOGLE INC.'S ADMINISTRATIVE
31 MOTION FOR LEAVE TO FILE
32 DOCUMENTS UNDER SEAL IN
33 CONNECTION WITH GOOGLE INC.'S
34 REPLY TO PLAINTIFFS'
35 SUPPLEMENTAL OPPOSITION TO
36 GOOGLE INC.'S MOTION FOR
37 SUMMARY JUDGMENT**

38 Date: June 11, 2007
39 Time: 9:00 a.m.
40 Dept.: Courtroom 8
41 Judge: Honorable James Ware

Defendant Google Inc.’s (“Google”) Motion for Leave to File Documents Under Seal in Connection with Google Inc.’s Reply to Plaintiffs’ Supplemental Opposition to Google Inc.’s Motion for Summary Judgment was heard before this Court on June 11, 2007, at 9:00 a.m. Upon consideration of this Motion and the supporting Declaration of M. Christopher Jhang filed therewith, the Court finds there is good cause to grant Google’s request to file the following documents under seal:

1. **GOOGLE INC.'S REPLY TO PLAINTIFFS' SUPPLEMENTAL OPPOSITION TO GOOGLE INC.'S MOTION FOR SUMMARY JUDGMENT;**
2. **EXHIBITS A-C OF THE SUPPLEMENTAL DECLARATION OF M. CHRISTOPHER JHANG IN SUPPORT OF GOOGLE INC.'S REPLY TO PLAINTIFFS' SUPPLEMENTAL OPPOSITION TO GOOGLE INC.'S MOTION FOR SUMMARY JUDGMENT**

GOOD CAUSE having been shown, the Court finds that:

- (1) The parties possess overriding confidentiality interests that overcome the right of public access to the record in the following documents;
- (2) The parties' overriding confidentiality interests support sealing the record;
- (3) A substantial probability exists that the parties' overriding confidentiality interests will be prejudiced if the record is not sealed;
- (4) The proposed sealing is narrowly tailored; and
- (5) No less restrictive means exist to achieve this overriding interest.

IT IS THEREFORE ORDERED that Google's Motion for Leave to File Documents Under Seal is GRANTED.

IT IS SO ORDERED.

DATED: _____

The Honorable James Ware
United States District Judge